



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

JUL 16 2015

OFFICE OF
AIR, WASTE AND
TOXICS

WA3019

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7.16.15

Ms. Georgia Baxter
Chief Executive Officer
J.H. Baxter and Company
PO Box 5902
San Mateo, California 94402

Re: Comments on Corrective Measures Study, Source Area Investigation and Chemical Oxidation
Bench Study (Study Report) and Call-in for Revised Corrective Measures Study
Former J.H. Baxter & Co., Arlington Facility (Facility)
RCRA Section 7003 Administrative Order on Consent (Order)
Docket No.: RCRA-10-2001-0086
EPA ID No.: WAD 05382 3019

Dear Ms. Baxter:

The U.S. Environmental Protection Agency, Region 10 has reviewed J.H. Baxter's Source Area Investigation and Chemical Oxidation Bench Study (Study Report). The Study Report is dated December 23, 2014 and was submitted to the EPA on March 18, 2015. The EPA has also reviewed J.H. Baxter's Corrective Measures Study, Revision 3 (CMS), dated April 2013. Comments on the CMS are enclosed. The Study Report and the CMS are required under Paragraph 53 of the above-referenced Order.

The EPA and J.H. Baxter representatives discussed the results of the bench study in a meeting on March 23, 2015 and concluded that a more-effective remedy must be evaluated. For that reason and because chemical oxidation was the preferred alternative presented in the CMS, a revised CMS is required. Pursuant to Paragraph 53 of the Order, the EPA is hereby requiring J.H. Baxter to submit, within 30 days of receipt of this letter, a revised CMS which proposes and evaluates remedial action alternatives in light of the results of the bench study and addresses the enclosed EPA comments on the CMS.

Please contact me at (206) 553-6702 or at Palumbo.Jan@epa.gov, or have your legal counsel contact Jennifer MacDonald at (206) 553-8311 or MacDonald.Jennifer@epa.gov, if you have any questions.

Sincerely,

Jan Palumbo
Project Coordinator

Enclosure

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USEPA RCRA



3019772

Mr. James C. Hanken
Wolfstone, Panchot & Bloch

Ms. Rue Ann Thomas
Nattura Group

Mr. Edward C. Smith
McFarland Cascade Holdings Inc.
Stella-Jones Corp.

Mr. Dean Yasuda
Washington State Department of Ecology

Ms. Heidi Blischke
GSI Water Solutions, Inc.

Y900 3117
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up levels should be based on

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not seem to be a part of Alternative 6. Make the appropriate correction.

- Section 9.3, Parcel B, p. 70. This section states that there is only one location of soil contamination above cleanup levels, in shallow soils, and that corrective action is not appropriate. Provide a basis for why corrective action is not appropriate.
- Section 10.1, pp 72 – 75. This section refers to “total fluids recovery” and “total fluids system” but these terms are not defined. It is unclear whether or not it includes pumping of groundwater. Define and clearly describe the “total fluids system.”
- Section 10.1.3, Environmental Criteria, p. 75. This section states that “Alternative 1 is[sic] rapidly provides hydraulic containment near the source area, aggressively recovers LNAPL, and provides enhanced bioremediation for the downgradient plume.” It is unclear from the preceding description of this alternative how these objectives will be met. Provide details of this alternative.
- Section 10.5.1.1, p. 89, third paragraph. This paragraph states that “By inhibiting high-concentration COCs to migrate downgradient and using total fluids recovery to accelerate contaminant removal rates, this alternative is expected to result in the contraction of the groundwater plume’s leading edge.” It is unclear what is meant by this statement. Clarify.
- Table 3-2 (see also comment 2 above). This table presents proposed cleanup levels for soil. It shows different cleanup levels for Parcel A and Parcel B, and for most constituents the cleanup levels for Parcel B are much higher than for Parcel A. Yet Parcel A is where the highest concentrations and amounts of soil contamination are located. It is not clear why the Parcel A cleanup levels are not also used for Parcel B. Clarify.
- Table 4-2 (see also comment 4 above). This table shows an exceedance of the cleanup levels for RRO at SB-57. Provide a justification for not providing a remedy for this exceedance.
- Table 11-2. Two alternatives, 1 and 2, are ranked 5, although they have different combined scores. If this was intentional, provide a clarification.
- Figure F-21. It is difficult to match up the colors of the shading with the concentrations. The concentrations in wells do not seem to be shaded with the appropriate colors in the figure, particularly in the area of MW-15, 16, 17, 18, 37, 39, 41 and 42. For example, some wells are labeled “nd” but are in areas shaded to indicate detected contamination. Clarify or correct the figure.

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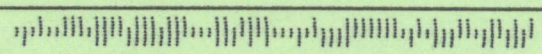
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JUL 31 2015

Ms. Jan Paumbo
U.S. Environmental Protection Agency
1200 Sixth Avenue
Suite 900, MS-OAWT-150
Seattle, WA 98101



**ENVIRONMENTAL PROTECTION AGENCY REGION 10
COMMENTS ON CORRECTIVE MEASURES STUDY – REVISION 3
FORMER J.H. BAXTER & COMPANY WOOD TREATING FACILITY
ARLINGTON, WASHINGTON**

July 16, 2015

SPECIFIC COMMENTS

1. Acronyms and Abbreviations, p. vii. Add ERH to the list of acronyms.
2. Section 3.2, Proposed Cleanup Levels, p. 16. This section states that the cleanup levels for Parcels A and B are different based on differences in historical activities. It is unclear why historical differences would lead to different cleanup levels. Cleanup levels should be based on current and potential future use. Clarify.
3. Section 9.2.6, Alternative 6, p. 69, third paragraph. This paragraph mentions ERH. ERH does not seem to be a part of Alternative 6. Make the appropriate correction.
4. Section 9.3, Parcel B, p. 70. This section states that there is only one location of soil contamination above cleanup levels, in shallow soils, and that corrective action is not appropriate. Provide a basis for why corrective action is not appropriate.
5. Section 10.1, pp 72 – 75. This section refers to “total fluids recovery” and “total fluids system” but these terms are not defined. It is unclear whether or not it includes pumping of groundwater. Define and clearly describe the “total fluids system.”
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8. Table 3-2 (see also comment 2 above). This table presents proposed cleanup levels for soil. It shows different cleanup levels for Parcel A and Parcel B, and for most constituents the cleanup levels for Parcel B are much higher than for Parcel A. Yet Parcel A is where the highest concentrations and amounts of soil contamination are located. It is not clear why the Parcel A cleanup levels are not also used for Parcel B. Clarify.
9. Table 4-2 (see also comment 4 above). This table shows an exceedance of the cleanup levels for RRO at SB-57. Provide a justification for not providing a remedy for this exceedance.
10. Table 11-2. Two alternatives, 1 and 2, are ranked 5, although they have different combined scores. If this was intentional, provide a clarification.
11. Figure F-21. It is difficult to match up the colors of the shading with the concentrations. The concentrations in wells do not seem to be shaded with the appropriate colors in the figure, particularly in the area of MW-15, 16, 17, 18, 37, 39, 41 and 42. For example, some wells are labeled “nd” but are in areas shaded to indicate detected contamination. Clarify or correct the figure.

Region 10 Routing and Concurrence

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Addressee:	Georgia Baxter		
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PROGRAM OFFICE CONCURRENCE:

Name:	BLANKENSHIP	KNITTEL	CASTRILLI	VALDEZ	HEDEEN		
Initials/Date:							

RA OFFICE CONCURRENCE/SIGNATURE:

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cc(s) (include name, title, organization, mailing address, and email if PDF is required—attach a list if necessary)

James C Hanken Wolfstone, Panchot & Bloch 1111 Third Ave., Suite 1800 Seattle WA 98101	Ms. Heidi Blischke GSI Water Solutions, Inc. 55 SW Yamhill St., Suite 300 Portland, OR 97204	Ms. RueAnn Thomas Environmental Programs Director J.H. Baxter & Co. P.O. Box 10797 Eugene, OR 97440-2797
Edward C. Smith Senior Environmental Manager McFarland Cascade Holdings Inc. P.O. Box 1496 Tacoma, WA 98401-1496		Mr. Dean Yasuda Washington Department of Ecology 3190 160th Ave SE Bellevue, WA 98008-5452

bcc(s) (include name, title, organization, mailing address, and email if PDF is required—attach a list if necessary)

	J. Palumbo (AWT-121)	
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